

United States District Court
District of Massachusetts

Gannon and Scott, Inc.)
Plaintiffs) Civil Action No. 05-11386WGY
)
v.)
)
Peggy Tolan, Elizabeth Tolan)
And Sarah Tolan)
Defendants)

VERIFIED REQUEST TO ENTER DEFAULT

Defendant, Sarah Tolan, respectfully requests the Clerk to enter the default of defendant Peggy Tolan. This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Defendant states:

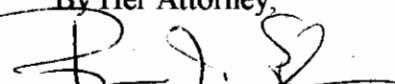
1. Plaintiff filed a Complaint for Statutory Interpleader on or about June 30, 2005.
2. Defendant, Sarah Tolan, timely filed an Answer to Plaintiff's Complaint.
3. Said complaint was served on Defendant, Peggy Tolan on or about July 18, 2005.
4. Defendant, Peggy Tolan, has never filed an Answer or responsive pleading to Plaintiff's Complaint.

Wherefore, Defendant Sarah Tolan seeks entry of Default against Defendant, Peggy Tolan in this matter.

Respectfully Submitted,

Sarah Tolan

By Her Attorney,



Brian J. Sylvia

Watt & Sylvia

628 Pleasant Street

New Bedford, MA 02740

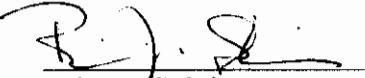
508-984-1470

BBO# 567925

Date: September 2, 2005

VERIFICATION

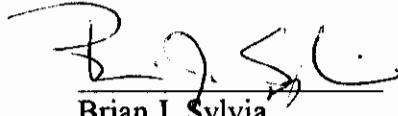
I, Brian J. Sylvia, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.



Brian J. Sylvia

CERTIFICATE OF SERVICE

I, Brian J. Sylvia, certify that on this 2nd day of September, 2005, served a copy of the within Verified Request to Enter Default to the Plaintiff's, Gannon & Scott, Inc. 33 Kenney Drive, Cranston, Rhode Island and Defendant Peggy Tolan, Inmate # F80370 at Massachusetts Correctional Institution, 99 Loring Drive in Framingham, MA 01702 by first class mail, postage prepaid.



Brian J. Sylvia